REMARKS/ARGUMENTS

This Amendment is in response to the final Office Action mailed April 1, 2009. Before this Amendment, claims 1-42, 44-48, and 50-68 were pending. In this Amendment, claims 1, 7, 12, 14, 16-18, 20-22, 24-25, 28, 32-33, 36-37, 39, 41-42, 44-47, 51-53, 57, 59, 62, and 65 have been amended, no claims are canceled, and no new claims are presented for consideration. After entry of this Amendment, which is respectfully requested, claims 1-42, 44-48, and 50-68 will still be pending.

I. AMENDMENT TO THE SPECIFICATION

An amendment has been made to the specification to correct an obviously incorrect reference identifier. No new matter is added hereby.

II. CLAIM REJECTIONS UNDER 35 U.S.C. § 102

The Office Action rejected all the pending claims (claims 1-42, 44-48, and 50-68) as being anticipated by Lee (US 2002/0129024) (hereinafter "Lee"). In order for a claim to be anticipated under 35 U.S.C. §102, a single prior art reference must not only disclose all elements of the claim within the four corners of the document, but must also disclose those elements "arranged as in the claim" (*Net MoneyIN Inc. v. VeriSign Inc.*, 545 F.3d 1359 (Fed. Cir. 2008) (quoting *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548 (Fed. Cir. 1983))). Applicants respectfully traverse the rejections because the cited references fail to teach or suggest all of the claim limitations.

For example, claim 1 as amended recites:

> invoke a **first parallel processing thread** to process the first compound transform definition including the first sub-definition;
>
> :
>
> invoke a **second parallel processing thread** to process the second compound transform definition including the second sub-definition,
>
> concurrently navigate the selected first compound transform process definition, the selected second compound transform definition, and the

> data to be transformed using the parallel processing threads, navigation within the data to be transformed being responsive to transform definitions within the selected first and second transform process definitions

(emphasis added). This is supported by the original application, for example in paragraph [0050] of the specification.

Lee does not disclose invoking parallel processing threads to process compound transform process definitions including sub-definitions. Instead, Lee's system merely transforms XML data using XML templates without mention of parallel processing threads (*see, e.g.*, Lee paragraph [0293]). Applicants have found no disclosure, teaching, or suggestion that concurrent or parallel processes are or should be used in Lee's navigation of XML templates, style sheets, or schemas and transformations. Furthermore, Applicants have searched the 97 pages of Lee and found no reference to parallel processes used for such navigation and transformations.

The Office Action apparently asserts that Lee paragraphs [0293] and [0301] disclose parallel processing in that Lee's system traverses transform definitions by concurrently traversing the data to be transformed and the transform definition (Office Action pp. 5-6). However, these paragraphs do not describe parallel processing. Lee paragraph [0293] describes requesting data from multiple programs (*see* Lee paragraph [0292]) and formatting the retrieved data in an output XML file. Lee paragraph [0301] describes maintaining a list of the programs from which data is gathered. Neither paragraph teaches or suggests "invok[ing] a first parallel processing thread to process the first compound transform definition including the first sub-definition" or "invok[ing] a second parallel processing thread to process the second compound transform definition including the second sub-definition."

Invoking parallel processing threads to process compound transform process definitions can allow multiple sections and sub-definitions within a file to be transformed simultaneously by different processors. This enables lower speed, lower cost processors to perform the work of a higher speed, higher cost processor. This also enables faster processing with high speed processors. In an embodiment as described in the specification, a definition pointer points to the beginning of a compound transform definition in a file, indicating where a

first parallel processing thread should start. The definition pointer then skips the sub-definitions of the compound transform definition and points to the beginning of another compound transform definition, indicating where a second parallel processing thread should start. The first parallel processing thread transforms the skipped sub-definitions while the second parallel processing thread transforms the second transform definition (including its sub-definitions). (*See, e.g.,* specification paragraph [0050]). Of course, parallel processing threads can be used for greater numbers of compound transform process definitions. Parallel processing large numbers of compound transform process definitions in parallel can shorten the time to transform data, especially those with deep (*i.e.* many sub-layers) of sub-definitions.

Because Lee fails to disclose, teach, or suggest "invok[ing] a first parallel processing thread to process the first compound transform definition including the first sub-definition" and "invok[ing] a second parallel processing thread to process the second compound transform definition including the second sub-definition," the reference does not anticipate the claim. For at least this reason, Applicants respectfully request withdrawal of the § 102 rejection of claim 1 and all claims depending therefrom.

Independent claims 7, 14, 20, 32, 44, 57, 59, 62, and 65 have been amended similarly to claim 1. For at least the reasons above, Applicants respectfully request withdrawal of the § 102 rejections of the claims and all claims depending therefrom.

III. AMENDMENTS TO THE CLAIMS

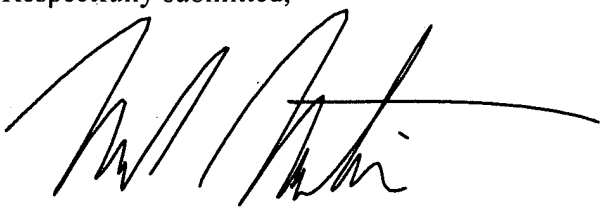
Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



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